UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

MMOBUOSI ODOGWU BANYE (a/k/a DOZY MMOBUOSI), TINGO GROUP, INC., AGRIFINTECH HOLDINGS, INC. (f/k/a TINGO INC.), and TINGO INTERNATIONAL HOLDINGS, INC.,

Defendants,

1:23-cv-10928 (JMF)

NOTICE OF PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S MOTION FOR AN ORDER AUTHORIZING ALTERNATIVE SERVICE OF PROCESS ON DEFENDANT MMOBUOSI

PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, the Declaration of Michael DiBattista and exhibits attached thereto, and the Declaration of Matthew Greiner, Plaintiff Securities and Exchange Commission will move this Court, before Hon. Jesse M. Furman, at the federal courthouse located at 500 Pearl Street, New York, New York, 10007, on a date to be set by the Court, for an order pursuant to Rule 4(f) of the Federal Rules of Civil Procedure, permitting alternative service of the summons and complaint on Defendant Mmobuosi Odogwu Banye (a/k/a Dozy Mmobuosi).

Dated: New York, New York May 10, 2024 SECURITIES AND EXCHANGE COMMISSION

By: /s/ David Zetlin-Jones

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